



AMERICAN VETERINARY MEDICAL ASSOCIATION

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February 10, 2000

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

RE: DOCKET NUMBER 97N-0074

Dear Sir or Madam:

The American Veterinary Medical Association, on behalf of its 64,000 members, provides the following comments on the "Draft Preliminary Food Safety Strategic Plan for Public Review, January 7, 2000." The AVMA is the national professional association of veterinarians whose members are charged ethically and legally with the protection of the health of animals within their care, as well as the protection of public health.

We commend the President's Council on Food Safety for developing the draft strategic plan and for the openness of the process. As evidenced by the latest draft that focuses on risk assessment, management and communications; the President's Council is listening to the public and making appropriate adjustments to the plan. With a few recommended changes, the AVMA supports the current draft.

The draft discusses various organizational considerations representing a continuum from strengthening the current system, to consolidating specific overlapping functions, to designating a lead agency, to creating a consolidated agency for most or all food safety functions. The President's Council does not recommend a particular option but requested comments.

The evaluation criteria for the food safety organization includes a seamless food safety system that facilitates the integration of research, surveillance, inspection, enforcement, and education functions of the federal government. Additionally, the food safety system must be effective, efficient, science-based, and comprehensive, and instill public confidence.

It is difficult to envision how the identified criteria can be satisfied without significant consolidation of most food safety functions in one agency. The American Veterinary Medical Association advocates cooperative federal and state regulatory and educational action toward food safety assurance, including a coordinated, integrated, unified food safety regulatory program that is managed by a single federal agency that cooperates closely with state and municipal programs. The AVMA recommends that the single agency be located in the U.S. Department of Agriculture which has the expertise and resources to manage the full scope of the

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food quality assurance program as a continuous process from breeding through production, processing, distribution, sales, and consumption, including consumer education through the cooperative extension service and other forms of outreach.

A few specific comments on the draft plan follow.

Science and Risk Assessment Goal, Objective 3, Action Item – Complete and periodically update a comparative risk analysis of acute and chronic foodborne risks from microbial, chemical and physical hazards.

We commend you for inclusion of this action item. A comparative risk analysis of foodborne risks is essential to enable proper allocation of limited resources. High priority must be assigned to this action item.

Science and Risk Assessment Goal, Objective 5, Action Item – Develop programs (1) to provide opportunities for government regulatory and research scientists to maintain their academic credentials (e.g., adjunct professorship programs), and (2) to encourage scientists from academic institutions, including schools of medicine and public health, to participate in governmental food safety and public health activities (e.g., food safety policy or review sabbaticals; IPA positions).

To provide an enhanced scientific infrastructure and skill set at federal, state, and local levels, do not limit yourself to scientists from schools of medicine and public health to participate in governmental food safety and public health activities. Schools of veterinary medicine are a source of great expertise in food safety and public health.

Risk Management Goal, Objective 3, Action Item – Develop a network of animal diagnostic laboratories to enhance national, systematic monitoring in animal feeds and feed-stuffs for microbial, chemical and other hazards that pose a food safety risk.

We support this action item except that it is too limited. We urge expansion to include a network of animal diagnostic laboratories that monitors zoonotic diseases in animals and provides surveillance of antimicrobial resistance in zoonotic and animal pathogens.

Risk Management Goal, Objective 5, Action Item – Allocate enforcement resources on the basis of greatest risks. Target compliance inspections; e.g. inspections targeted at the foods most frequently associated with illnesses and hazards; at facilities with a history of non-compliance and at the most critical points in the farm-to-table chain for occurrence of hazard-producing or hazard-controlling events.

We support this action item but urge that the concept of “most critical points in the farm-to-table chain” also include the concept of “most effective points or most achievable control points”.

Risk Management Goal, Objective 7, Action Item – Expedite review of new animal drugs that are intended to reduce food safety risks.

We enthusiastically support this action item. These drugs include but are not limited to probiotics. Certain antimicrobials are also included. Resources need to be prioritized for FDA's Center for Veterinary Medicine to accomplish this action item.

Thank you for the opportunity to comment on the Draft Preliminary Food Safety Strategic Plan. We look forward to working with the President's Council on Food Safety and the federal agencies to implement the action items.

Sincerely,

A handwritten signature in cursive script that reads "Bruce W. Little". The signature is written in dark ink and is positioned above the printed name and title.

Bruce W. Little, DVM
Executive Vice President

BWL/CPHRVM/LPV